Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Delete, Delete, Delete	)	GN Docket No. 25-133
	)	

COMMENTS OF AMERICA'S PUBLIC TELEVISION STATIONS AND PUBLIC BROADCASTING SERVICE

America's Public Television Stations ("APTS")[1] and the Public Broadcasting Service ("PBS")[2] (collectively, "Public Television") submit these comments in response to the Federal Communications Commission's (the "Commission's" or "FCC's") Public Notice on eliminating burdensome regulation ("Public Notice").[3] The Commission's objective is to "alleviat[e] unnecessary regulatory burdens," and thus it seeks comment on initiatives that would facilitate and encourage investment in networks, infrastructure, and innovative capabilities.[4] Public Television welcomes this opportunity to suggest deletion or modification of several unnecessarily burdensome rules applicable to noncommercial educational ("NCE") television stations. These recommended updates

[1] APTS is a nonprofit membership organization ensuring a strong and financially sound public television system and helping member stations provide essential public services in public safety, education and community connections to the American people.

[2] PBS and its 337 local member stations across the country offer all Americans the opportunity to explore new ideas and new worlds through noncommercial content that is unique across the media landscape. Each month, over 100 million people turn to their local PBS station, where they are invited to hear diverse perspectives, to take front row seats to world-class drama and performances, and to experience the worlds of history, public affairs, science, and nature through in-depth educational programming.

[3] Public Notice, *IN RE: DELETE, DELETE, DELETE*, GN Docket No. 25-133, DA 25-219 (rel. Mar. 12, 2025) (hereinafter "Public Notice").

[4] *Id*. at 1.

would help public television stations focus scarce resources on the operations, infrastructure, and innovation necessary to serve their essential public service mission.

I. Public Television Urges the Commission to Reduce the Regulatory Burden of Various Outdated Non-Content Rules

- **73.1226 – Station Logs and Records**

This rule (and the others listed below) mandate station logging and recordkeeping that are no longer necessary. Related rules include:

- 73.1800 – General Requirements Related to the Station Log
- 73.1820 – Station Log
- 73.1835 – Special Temporary Records
- 73.1840 – Retention of Logs
- Similar rules also apply to TV translators (74.781) and FM translators (74.1265)

These rules contain numerous procedural requirements relating to the creation and maintenance of station logs. For example, current rules mandate, among other things, a signature by each entry, regulate how abbreviations may be used, and prescribe how stations are to approach daylight savings time.[5] These requirements are unnecessary, particularly given the automatic logging made possible by advances in technology. Moreover, substantive logging requirements have decreased over time: the only pieces of information that generally are still required to be logged are tower light extinguishments, Emergency Alert System ("EAS") tests, and EAS activations. Public Television urges

[5] 73 C.F.R. § 1800(a)-(b)

the Commission to revisit these formal paperwork requirements to simplify and streamline all such recordkeeping and logging mandates.

- **73.1870 – Chief Operators**

This rule requires each broadcast station to designate (in writing) a chief operator and an acting chief operator when the chief operator is unavailable, and specifies certain duties, including inspecting and calibrating transmission systems and weekly review and verification of "station records." Clearly, skilled technical personnel are required for the proper operation and maintenance of broadcast stations, and the Commission may also reasonably seek to have stations identify a technical contact person for each station. But in light of the fact that the FCC has not required stations to have licensed "operators" for decades, and in light of changes in technology – namely, the automation of stations and advancements in the reliability of computer-controlled transmission systems – the formal position of "chief operator" and the associated duties have become an unnecessary and outdated regulatory burden.

- **73.3615 – Ownership Reports**

This rule requires broadcast stations to file ownership reports every two years on December 1 of odd-numbered years. However, other than in connection with a license transfer or transfer of station control, there is no reason why these reports should be required every two years. Inasmuch as the Commission's multiple ownership rules do not apply to noncommercial broadcasters, tracking attributable holdings of the officers or board members of noncommercial licensees serves little regulatory value. Instead, it merely presents a paperwork and reporting burden to licensees, along with their officers and board members, and imposes unnecessary administrative burdens on the

Commission. As former Chairman Pai noted in a statement in connection with a 2017 proceeding:

> Americans who serve as officers or board members of public radio and television stations generally don't do it for money or personal glory. Quite the opposite: they're volunteers who want to serve their communities. The last thing we should do is penalize them with unnecessary regulatory burdens, particularly when these requirements will deter them from volunteering in the first place.[6]

Absent a meaningful change in control or ownership of a station, the Commission would be well-served instead by filings made every eight years in connection with the license renewal applications for each station. Reducing the frequency of this burdensome reporting requirement would directly serve the Commission's goals in this proceeding.

II. Public Television Requests That the Commission Modernize or Delete the Requirements of the Outdated Station Identification Rule

- **73.1201 – Station Identification**

This rule prescribes detailed requirements for the broadcast of daily and hourly station IDs, including IDs for individual television and radio transmitters being operated as part of state and regional networks, as well as television and radio multicast channels.

Public Television believes – and its experience demonstrates – that there is no rationale to retain a formal station identification rule. Viewers and listeners know what stations they are receiving due to the station's programming and channel position. More importantly, even if the rule is eliminated, stations will continue to identify themselves

[6] *Promoting Diversification of Ownership in the Broadcasting Services; Amendment of Part 1 of the Commission's Rules Concerning Practice and Procedure, Amendment of CORES Registration System,* Order on Reconsideration, 32 FCC Rcd 3440, 3456 (2017) (Statement of Chairman Ajit Pai); *see also id*. at 3458 (Statement of Commissioner Michael O'Rielly) (discussing burden of ownership reporting on public broadcasters).

on-air in some clear manner to build and maintain brand identity. Electronic monitoring for regulatory enforcement purposes can also easily determine the broadcast frequency on which any station is operating.

The existing formal ID rules are particularly difficult for stations operating as part of a state or regional network that has many stations and translators, all of which need to be identified together under the current rule. The result is a crowded announcement more likely to lead to confusion rather than clarification. Public Television believes that the requirements for identifying multicast channels likewise can result in audience confusion – operating at cross-purpose to the original rationale for the rule. Public Television recommends that the formal station ID rule simply be eliminated.[7] Stations should be given the freedom to identify themselves on-air in a manner that makes the most sense to the local station.

III. Upgrades to Commission Filing Systems Would Dramatically Reduce Regulatory Burdens and Increase Efficiency

The Commission should take whatever steps are necessary to increase the resiliency and reliability of its online filing systems and other public-facing technology. Public Television's experience has demonstrated that station licensees (and Commission staff) often face a significant burden attempting to interact with the Commission's systems due to unscheduled downtime or other issues. For example, stations regularly encounter difficulty attempting to upload materials to the Commission's Online Public Information File system (which is an obligation that stations face at least quarterly). This

[7] The station ID rules that also currently apply to TV translators (74.783) and FM translators (74.1283) should similarly be eliminated.

regularly forces station staff to make multiple attempts to comply with their regulatory obligations, often at night or on weekends outside of work hours, at additional cost to stations and often to the exclusion of other important local work. Likewise, when the Licensing and Management System or the Universal Licensing System experience downtime or decreased reliability, outside counsel and consulting engineers working on applications and other filings have to spend more time than necessary attempting to complete their work, directly increasing compliance costs for broadcasters. While it may require additional resources, investment in Commission technology could do as much to reduce the regulatory burden on broadcasters as eliminating multiple unnecessary rules.

Conclusion

Public Television appreciates the Commission's willingness to reconsider outdated and unnecessarily burdensome rules, and Public Television urges the FCC to review and modernize the rules specified in these comments.

Respectfully submitted,

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